

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:)	Case No. 14-41167-705
)	Judge Charles E. Rendlen III
FRANK JAMES JOHNSON)	Chapter 7
and ANGELIQUE MARIE JOHNSON,)	
)	
Debtors.)	
)	E. Rebecca Case, EDMO #38010MO,
)	MO Bar #38010
)	Stone, Leyton & Gershman
)	A Professional Corporation
)	7733 Forsyth Blvd., Suite 500
)	St. Louis, MO 63105
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)	(314) 721-8660 (facsimile)
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**TRUSTEE'S MOTION FOR APPROVAL OF
EMPLOYMENT OF ATTORNEYS**

Chapter 7 Trustee E. Rebecca Case pursuant to 11 U.S.C. §§327 and 328 files this Motion for Approval of Employment of Attorneys and in support thereof respectfully states as follows:

1. The Court has jurisdiction in regard to this matter pursuant to 28 U.S.C. §151, §157 and §1334.
2. Debtors Frank James Johnson and Angelique Marie Johnson ("Debtors") filed a Petition for Relief under the provisions of Chapter 7 of Title 11 of the United States Code on February 25, 2014.
3. E. Rebecca Case was appointed Chapter 7 Trustee.
4. Chapter 7 Trustee E. Rebecca Case ("Trustee Case") moves the Court to allow her to employ an attorney, Janice R. Valdez, and the law firm of Stone, Leyton & Gershman, A Professional Corporation, to assist Trustee Case in carrying out the Trustee's duties under Title

11 of the United States Code.

5. Trustee Case requires the assistance of counsel in order to assist Trustee to compel Debtors to turnover their 2013 Federal and State income tax returns and refunds in addition to providing such other advice and assistance on matters which may arise during the administration of this estate.

6. Trustee Case has made careful and diligent inquiry into the qualifications and competence of Janice R. Valdez and the members of the law firm of Stone, Leyton & Gershman, A Professional Corporation.

7. Trustee Case has been advised that Janice R. Valdez has been admitted to practice in the United States District Court for the Eastern District of Missouri and believes that Janice R. Valdez and the law firm of Stone, Leyton & Gershman, A Professional Corporation, are capable of providing proper legal counsel to Trustee Case.

8. The current hourly rate for Janice R. Valdez is \$260.00 per hour. These rates will be subject to increase on an annual basis at the beginning of each calendar year.

9. Janice R. Valdez and Stone, Leyton & Gershman, A Professional Corporation, have no connection with any creditor or interested party herein, the United States Trustee or any employee of the United States Trustee, and represent no interest adverse to the estate or to the Debtors.

10. Trustee Case has engaged Janice R. Valdez and the law firm of Stone, Leyton & Gershman, A Professional Corporation, as attorneys for Trustee Case subject to the approval and confirmation of said employment by the United States Bankruptcy Court.

WHEREFORE, Trustee Case prays that the United States Bankruptcy Court approve and

confirm the employment of Janice R. Valdez and the law firm of Stone, Leyton & Gershman, as Counsel for Trustee Case.

Respectfully submitted,

STONE, LEYTON & GERSHMAN,
A Professional Corporation

By:


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MO Bar #38010
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Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via first class, United States mail, postage prepaid and/or electronic notice on March 24, 2014 to the following:

1. Frank James Johnson Debtor
423 Emmet Avenue
St. Louis, Missouri 63135
2. Angelique Marie Johnson Debtor
423 Emmet Avenue
St. Louis, Missouri 63135
3. Office of the United States Trustee
Thomas F. Eagleton Courthouse
111 South Tenth Street, Suite 6353
St. Louis, Missouri 63102

E. Rebecca Case

/s/ E. Rebecca Case
E. Rebecca Case